

David W. Parham  
State Bar No. 15459500  
John Mitchell  
State Bar No. 00797095  
Rosa A. Shirley  
State Bar No. 24056313  
BAKER & MCKENZIE LLP  
2300 Trammell Crow Center  
2001 Ross Avenue  
Dallas, Texas 75201  
Telephone: (214) 978-3000  
Facsimile: (214) 978-3099  
Email: [david.parham@bakermckenzie.com](mailto:david.parham@bakermckenzie.com)  
Email: [john.mitchell@bakermckenzie.com](mailto:john.mitchell@bakermckenzie.com)  
Email: [rosa.shirley@bakermckenzie.com](mailto:rosa.shirley@bakermckenzie.com)

- and -

Erin E. Broderick (*admitted pro hac vice*)  
BAKER & MCKENZIE LLP  
Illinois Bar No. 6295974  
300 East Randolph Drive, Suite 5000  
Chicago, Illinois 60602  
Telephone: (312) 861-8000  
Facsimile: (312) 861-2899  
Email: [erin.broderick@bakermckenzie.com](mailto:erin.broderick@bakermckenzie.com)

*Attorneys for Nobuaki Kobayashi,  
Bankruptcy Trustee and Foreign Representative  
of MtGox Co., Ltd., a/k/a MtGox KK*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re	)	Chapter 15
MtGox Co., Ltd. (a/k/a MtGox KK)	)	Case No. 14-31229-sgj15
Debtor in a Foreign Proceeding.	)	

**BAKER & MCKENZIE LLP’S MOTION TO WITHDRAW AS COUNSEL  
TO THE FOREIGN REPRESENTATIVE**

Baker & McKenzie LLP (“B&M”) hereby files this motion (the “Motion”) to withdraw as counsel to Nobuaki Kobayashi (the “Foreign Representative”), in his capacity as Bankruptcy

Trustee and Foreign Representative of MtGox Co., Ltd., a/k/a MtGox KK (the “Debtor”), seeking entry of an order, substantially in the form attached hereto as **Exhibit A**. In support of the Motion, B&M respectfully states as follows:

1. This Motion is unopposed.
2. By this Motion, B&M seeks entry of an order authorizing B&M to withdraw as counsel to the Foreign Representative in this chapter 15 case.
3. The Foreign Representative will continue to be represented in this chapter 15 case by the attorneys whose names are set forth below:

David J. Molton  
Daniel J. Saval  
BROWN RUDNICK LLP  
Seven Times Square  
New York, NY 10036  
Telephone: 212-209-4905  
Facsimile: 212-938-2893  
Email: [dsaval@brownrudnick.com](mailto:dsaval@brownrudnick.com)  
Email: [dmolton@brownrusnick.com](mailto:dmolton@brownrusnick.com)

Marcus A. Helt  
Thomas Scannell  
GARDERE WYNN SEWELL LLP  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201  
Telephone: 214-999-3000  
Facsimile: 214-999-3526  
Email: [mhelt@gardere.com](mailto:mhelt@gardere.com)  
Email: [tscannell@gardere.com](mailto:tscannell@gardere.com)

4. Each of the foregoing attorneys has filed a notice of appearance in this chapter 15 case on behalf of the Foreign Representative. *See* Dkt. Nos. 102, 103, 104, 105.
5. This Motion is based on good cause that following the transition of the Debtor’s foreign proceeding in the Twentieth Civil Division of the Tokyo District Court, Japan, from a civil rehabilitation proceeding to a bankruptcy proceeding, Mr. Kobayashi was appointed as the Debtor’s Foreign Representative, replacing Mr. Robert Marie Mark Karpeles.
6. No party will be prejudiced by the relief sought in this Motion.
7. Approval of B&M’s withdrawal as counsel to the Foreign Representative is not sought for delay but so that justice may be done.

**Prayer**

WHEREFORE, Baker & McKenzie LLP respectfully requests that the Court grant this Motion and enter an order substantially in the form attached hereto as Exhibit A, authorizing withdrawal of Baker & McKenzie LLP as counsel to the Foreign Representative and granting such other and further relief as the Court deems proper.

Dated: May 2, 2014  
Dallas, Texas

Respectfully submitted,

**BAKER & McKENZIE LLP**

By: /s/ David W. Parham  
David W. Parham  
State Bar No. 15459500  
John Mitchell  
State Bar No. 24056313  
Rosa A. Shirley  
State Bar No. 24056313  
2300 Trammell Crow Center  
2001 Ross Avenue  
Dallas, Texas 75201  
Telephone: (214) 978-3000  
Facsimile: (214) 978-3099  
Email: [david.parham@bakermckenzie.com](mailto:david.parham@bakermckenzie.com)  
Email: [john.mitchell@bakermckenzie.com](mailto:john.mitchell@bakermckenzie.com)  
Email: [rosa.shirley@bakermckenzie.com](mailto:rosa.shirley@bakermckenzie.com)

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Erin E. Broderick (*admitted pro hac vice*)  
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300 East Randolph Drive, Suite 5000  
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Email: [erin.broderick@bakermckenzie.com](mailto:erin.broderick@bakermckenzie.com)

*Attorneys for Nobuaki Kobayashi,  
Bankruptcy Trustee and Foreign  
Representative of MtGox Co., Ltd., a/k/a  
MtGox KK*

**CERTIFICATE OF SERVICE**

This is to certify that on May 2, 2014, a copy of the foregoing document was served on the parties registered to receive electronic notification via the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, and via United States first class mail, postage pre-paid to the parties listed below:

Alicia E. Hwang  
Edelson PC  
350 North LaSalle St., Suite  
1300  
Chicago, IL 60654

Edgar Sargent  
Susman Godfrey LLP  
1201 3rd Avenue, Suite 3800  
Seattle, WA 98101-3087

Josephine Garrett  
Josephine Garrett, P.C.  
3119 West 5th Street  
Fort Worth, TX 76107

Megan Lindsey  
Edelson PC  
999 West 18th St., Suite 3000  
Denver, CO 80202

Roger M. Townsend  
Breskin Johnson & Townsend  
PLLC  
1000 2nd Ave., Suite 3670  
Seattle, WA 98104

Steven L. Woodrow  
Edelson PC  
350 North LaSalle St., Suite  
1300  
Chicago, IL 60654

Marcus A. Helt  
Gardere Wynn Sewell LLP  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201

Barry C. Barnett  
Susman Godfrey L.L.P.  
901 Main St., Suite 5100  
Dallas, TX 75202

G. Larry Engel, Vincent J.  
Novak, and Kristin A. Hiensch  
Morrison & Foerster LLP  
425 Market Street  
San Francisco, CA 94105-2383

Lisa L. Lambert  
U.S. Trustee  
Office of the U.S. Trustee  
1100 Commerce Street  
Dallas, TX 75242

MtGox, Co. Ltd. a/k/a MtGox  
KK  
11-5, Shibuya 2-chome,  
Shibuya-ku  
Tokyo, Japan

Scott B. Kitei  
Honigman Miller Schwarts and  
Cohn LLP  
2290 First National Bldg.  
660 Woodward Ave.

The Honorable Jeh Johnson  
Secretary of Homeland Security  
Department of Homeland  
Security  
Washington, DC 20528

Thomas Scannell  
Gardere Wynn Sewell LLP  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201

Christopher L. Door  
Edelson PC  
350 North LaSalle St., Suite  
1300  
Chicago, IL 60654

Jay Edelson  
Edelson PC  
350 North LaSalle St., Suite  
1300  
Chicago, IL 60654

Mark Karpeles  
6-28-3302, Aobadai 3-chome,  
Meguro-ku  
Tokyo, Japan

Robin E. Phelan  
Haynes and Boone, LLP  
2323 Victory Avenue, Suite  
700  
Dallas, TX 75219

Stephen Manz  
Haynes and Boone, LLP  
2323 Victory Avenue, Suite  
700  
Dallas, TX 75219

David J. Molton  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
Telephone: 212-209-4905

Daniel J. Saval  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036

/s/ David W. Parham  
David W. Parham

**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

_____	)	
In re	)	Chapter 15
	)	
MtGox Co., Ltd. (a/k/a MtGox KK)	)	Case No. 14-31229-sgj15
	)	
Debtor in a Foreign Proceeding.	)	
_____	)	

**ORDER GRANTING BAKER & MCKENZIE LLP'S MOTION TO WITHDRAW  
AS COUNSEL TO THE FOREIGN REPRESENTATIVE**

Upon the motion of Baker & McKenzie LLP, seeking authorization to withdraw as counsel to the Foreign Representative<sup>1</sup> [Dkt. No. \_\_\_\_]; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtor, its estate, its creditors, and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby:

\_\_\_\_\_  
<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

ORDERED, ADJUDGED AND DECREED that:

1. The Motion is GRANTED.
2. Baker & McKenzie LLP is hereby withdrawn as counsel to the Foreign Representative.
3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

### END OF ORDER ###

Prepared and submitted by:

**BAKER & McKENZIE LLP**

/s/ David W. Parham  
David W. Parham  
State Bar No. 15459500  
John Mitchell  
State Bar No. 24056313  
Rosa A. Shirley  
State Bar No. 24056313  
2300 Trammell Crow Center  
2001 Ross Avenue  
Dallas, Texas 75201  
Telephone: (214) 978-3000  
Facsimile: (214) 978-3099  
Email: [david.parham@bakermckenzie.com](mailto:david.parham@bakermckenzie.com)  
Email: [john.mitchell@bakermckenzie.com](mailto:john.mitchell@bakermckenzie.com)  
Email: [rosa.shirley@bakermckenzie.com](mailto:rosa.shirley@bakermckenzie.com)

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Erin E. Broderick (*admitted pro hac vice*)  
Illinois Bar No. 6295974  
300 East Randolph Drive, Suite 5000  
Chicago, Illinois 60602  
Telephone: (312) 861-8000  
Facsimile: (312) 861-2899  
Email: [erin.broderick@bakermckenzie.com](mailto:erin.broderick@bakermckenzie.com)

*Attorneys for Nobuaki Kobayashi,  
Bankruptcy Trustee and Foreign Representative  
of MtGox Co., Ltd., a/k/a MtGox KK*